

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: BENICAR
(OLMESARTAN) PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO
ALL CASES

MDL No. 2606

Hon. Robert B. Kugler, U.S.D.J.
Hon. Joel Schneider, U.S.M.J.

**CERTIFICATION OF DANIEL
B. CARROLL, ESQ.**

DANIEL B. CARROLL, ESQ., hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and am a partner of the law firm of Drinker Biddle & Reath LLP, attorneys for Defendants Daiichi Sankyo, Inc., Daiichi Sankyo U.S. Holdings, Inc., Forest Laboratories, Inc., Forest Pharmaceuticals, Inc. and Forest Research Institute, Inc. (collectively “Defendants”). I submit this Certification based on personal knowledge in support of Defendants’ Opposition to Plaintiffs’ Motion to Exclude the Testimony of Keith Wilson, M.D..

2. Attached hereto as Exhibit A is a true and correct copy of *In re Benicar (Olmesartan) Prods. Liab. Litig.*, Jan. 25, 2017 Transcript

3. Attached hereto as Exhibit B is a true and correct copy of relevant excerpted testimony from the Deposition of Dr. Susan Hutfless.

4. Attached hereto as Exhibit C is a true and correct copy of relevant excerpted testimony from the Deposition of Dr. Keith Wilson.

5. Attached hereto as Exhibit D is a true and correct copy of the decision of *In re Fosamax (Alendronate Sodium) Prods. Liab. Litig.*, Nos. 11-5304 & 08-08, 2013 WL 1558690 (D.N.J. Apr. 10, 2013).

6. Attached hereto as Exhibit E is a true and correct copy of the decision of *Schwartz v. Avis Rent a Car Sys., LLC*, No. 11-4052, 2014 WL 4272018(D.N.J. Aug. 28, 2014).

7. Attached hereto as Exhibit F is a true and correct copy of the decision of *See In re Benicar (Olmesartan) Prods. Liab. Litig.*, No. 15-2606, 2016 WL 6652358 (D.N.J. Nov. 8, 2016).

8. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.


Daniel B. Carroll

Dated: April 21, 2017